

Conference Spending Guide

Office of the Chief Financial Officer
Office of the Controller
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I. Purpose

Conferences and mission-related travel play an important role in government operations. Bringing EPA employees together in a single location - for program reviews, presentations of scientific findings, oversight boards or advisory groups – is often the most efficient and cost-effective means for achieving the EPA mission.

At the same time, EPA employees, officials, conference planners and ethics officials must exhibit due diligence in planning conferences. Conferences are an outward reflection of the agency's culture, values, and ethics. Travelers and planners must exercise the same care in incurring expenses that a prudent person would exercise if traveling on personal business. Accordingly, conference planners must ensure that all necessary documentation is provided when arranging an EPA conference. It is also prudent that arrangers ensure that the content of the conference materials exhibit ethical behavior, impartiality, and are cost-effectiveness.

Recent lapses in conferences held by other federal agencies have led to more stringent conference spending requirements for both federal-wide and EPA. The following guidance condenses these requirements into a single document which outlines the policies and procedures over the authorization and performance of conference-related activities. These policies ensure the agency meets federal requirements while also retaining proper internal control over conference-related spending.

II. Background

Federal requirements are outlined in [OMB Memorandum M-11-35](#), "Eliminating Excess Conference Spending and Promoting Efficiency in Government," [Memorandum M-12-12](#), "Promoting Efficient Spending to Support Agency Operations," and the [Fiscal Year 2013](#) and [Fiscal Year 2014](#) Continuing Resolutions.

Conference expenses must be in compliance with the strict requirements set out in the [Federal Travel Regulation](#) and the [Federal Acquisition Regulations](#). Furthermore, in accordance with Section 3 of [Executive Order 13589](#), "Promoting Efficient Spending," where possible agencies should look to host or sponsor conferences in space controlled by the federal government in order to reduce costs. Similarly, lodging costs for employees attending conferences and fees paid to subject-matter experts to speak at conferences should be minimized.

Conferences must also comply with [EPA Travel Manual \(Chapter 2550B of the Resources Management Directive System\)](#) and the United States Office of Government Ethics' [Collection of Federal Resources Relating to Conferences](#). Additionally, the EPA must ensure and justify that expenses related to food, beverage, or other refreshment costs are a necessary expense at conferences sponsored or hosted by the agency in accordance with [EPA Order 1900.3, Food at an EPA Conference, Workshop, Ceremony, Reception or Observance](#).

III. Conference Spending Assistance

Assistance with conference spending questions is readily available at EPA's conference planning site, <http://intranet.epa.gov/ocfo/conferences/>.

IV. Conference Policy

Conferences that fit the definition of a conference in Section V must be approved by the appropriate approval official prior to obligation via a signed EPA Form 5170.¹ After the occurrence of the event, the originating office must provide a report to the Office of Inspector General within 15 calendar days of the conclusion of the conference², provide actual expenses within 91 calendar days of the conclusion of the conference³, and annually certify the accuracy of fiscal year conference expenditures to OCFO at calendar year end.

Effective October 2014, all agency travel requires use of a conference project code in the agency's financial system. Contracts, Task Orders, etc. should also make use of the conference code in their accounting string to track and record conference expenditures.

V. Definitions

A. "Conference" or "conference-related activity"

An internal or external meeting, retreat, seminar, symposium or event [co-]hosted or [co-] sponsored by the EPA that involves \$20,000 or more in net expenses, which includes but not limited to, the following categories:

- Attendee travel paid for by the EPA;
- Training activities;
- Speaker fees;
- Food and refreshment expenses,
- Non-federal facility expenses,
- Audio visual expenses; and
- Contract-related conference expenses.

For the purposes of this guidance, these terms do not include conferences and conference-related activities that the EPA funds with grants and cooperative agreements.⁴ Although expenses funded by grants are not subject to conference reporting, EPA should continue to ensure grants have the proper authority for conference-related expenses.

¹ Conference policy is derived from June 2012 OCFO/OARM joint memorandum.

² Requirement only applicable to Hosted and Sponsored events, see section VI-C-1 and Appendix 6 for more information.

³ Events are required to be certified by the end of the calendar year - OCFO will notify SROs and RPIO conference point of contacts in October of the exact December due date - therefore offices should be aware of the necessity for events to be accurately and completely reported as outlined in section VI.C.3; events submitted towards the end of the fiscal year may not be privileged with the 91-day grace period.

⁴ See 5 CFR 410.404 and 41 CFR 300-3.1.

Exceptions

For the purposes of this guidance, certain types of activities should not be considered to be conferences even if the event meets the general definition above. Even where an event is considered exempt from this guidance, organizations are expected to continue to apply strict scrutiny to EPA's participation to ensure the best use of government funds and adherence with not only all applicable laws and policy, but the underlying principles, including but not limited to:

- Ensure only personnel attend events that have a mission-essential need to do so;
- Minimize expenses; and
- Limit participation in any associated social events to the greatest degree possible to avoid the appearance of impropriety.

Exceptions from this guidance should be granted sparingly and only when events fully meet the definition and intent of the criteria below.

- a. If the purpose of conference travel falls under "mission" as defined in FTR Chapter 301, Appendix C, "Travel Purpose Identifiers," the event is considered operational or managerial and does not need to be reported according to conference requirements. This exception includes meetings necessary to carry out oversight functions, such as investigations, audits, and non-conference planning site visits. The exemption also includes meetings to consider internal agency business matters, of little relevance outside the agency, and which are held in government facilities.

This exception includes formal classroom training held at government facilities that are technical, mission-related courses of instruction required by federal law or regulations and held on a regular basis.

To apply for an exception for events \$20,000 or greater, OCFO must be presented with your approved exemption request. Please reference our conference site for additional information: <http://intranet.epa.gov/ocfo/conferences/exemptions.htm>

- b. Meetings of advisory committees governed by the Federal Advisory Committee Act (FACA), where the membership of the committee consists of one or more individuals who are not full-time or permanent part-time Federal officers or employees. To apply for exception, events over \$20,000 must contact OCFO – please reference our conference site for additional information: <http://intranet.epa.gov/ocfo/conferences/exemptions.htm>

Exceptions are approved by the Assistant Administrator and Regional Administrator. OCFO assigns a conference exception code for the requesting office to utilize on tracking conference expenditures. OCFO also has the responsibility to review all approved exceptions and determine their validity with respect to standing law and guidance through a concurrence process. As noted above, exempted conferences are still required to be tracked and reported with the assigned conference code.

To apply for an exception, please file a Memorandum of Request along with the criteria checklist. These forms and further instructions are provided on the Reporting Requirement & Guidance section of our website under Guidance and Exemption Requirements:

<http://intranet.epa.gov/ocfo/conferences/reporting.htm>

In the case OCFO does not concur with the requester's approval, the originating office will have thirty calendar days (30) to appeal by providing OCFO additional information on the validity and rationale of the exception. If the originating office chooses not to appeal during the 30 calendar days, they lose or forfeit the appeal and they will be required to file a Form 5170.

Exception requests are not retroactive but valid at date of approval. Unless otherwise noted by the originating office, exceptions are valid for up to two years from date of approval by the Assistant Administrator and Regional Administrator.

B. "Conference expenses"

All direct and indirect conference costs paid by the EPA must be included in the electronic Form 5170, whether paid directly by the EPA or reimbursed by the EPA to travelers or others associated with the conference. See below exclusion for funds paid under federal grants to grantees.⁵ Conference expenses include any associated authorized travel and per diem expenses, room rental for official business, audiovisual, light refreshments, registration fees, ground transportation, and other expenses as defined by the Federal Travel Regulation. Entertainment-related expenses are expressly prohibited from conferences.⁶

Conference expenses should be net of any fees collected. The EPA must have statutory authority to charge a fee for one of its programs or activities. In addition, even if the EPA has authority to charge a fee, it may not retain and use the amounts collected without statutory authority. An appropriation establishes a maximum authorized program level, meaning that the EPA, absent statutory authorization, cannot operate beyond the level that can be paid for by its appropriations. The EPA may not circumvent these limitations by augmenting its appropriations from sources outside the government, unless Congress has so authorized the agency.

Conference expenses should not include grant funds or cooperative agreements. However, a grant or contract funded by amounts appropriated to an Executive Branch agency may not be used for the purpose of defraying the costs of a conference that is not directly and programmatically related to the purpose for which the grant or contract was awarded – in other words you are not allowed to inappropriately subsidize an event with grant funds or a cooperative agreement with purpose of defraying the costs of the event to avoid the requirement of filing a Form 5170 or to come below a reportable threshold that would otherwise require your event to be reported publicly.

⁵ EPA interprets the statement, "but do not include funds paid under Federal grants to grantees," to mean when a federal grantee uses its grant funds to travel to or attend an EPA conference, such expenses are not to be included as a cost of the conference. However, when grantee travel and attendance is funded by other means, such as EPA invitational travel orders or by contract, such expenses shall be included as a cost of the conference. The FTR provides some examples of direct and indirect conference costs included within conference expenses.

⁶ Illustrative examples of entertainment-related expenses that are unallowable include paying for motivational speakers (as contrasted to speakers with specific subject-matter expertise in the topic of the conference), hiring musicians or other entertainers to perform at conferences, procuring extraneous promotional items, decorations, or other goods and services for participants that are unrelated to the purpose of the conference, procuring tickets to recreational activities outside of the conference setting, or using funds to produce non-substantive audio/visual materials.

Activities funded by interagency agreement are considered EPA conferences or conference-related activities when the EPA is the lead agency. Conferences where the EPA is not the lead agency are subject to conference reporting requirements when the EPA contributes \$20,000 or more.

1. *The following costs are excluded from conference reporting:*

- a. Federal employee time for conference preparation or training.
- b. Federal employee time for attendance at the conference or en route.
- c. Security costs to ensure the safety of attending government officials.

2. *Revenue:*

Total conference expenses should be net of any fees or revenue received by the agency through the conference. This includes, but is not limited to, registration fees collected, exhibitor fees collected, and sponsor fees collected.

The EPA must have statutory authority to charge a fee for one of its programs or activities. Contact the EPA's Office of General Counsel with any questions regarding whether the agency has statutory authority to charge a fee.

C. "Host"

The EPA is the host if the agency is the primary convener of the event and provider of funding. Typical determinants of whether the EPA is the primary host are provided in Figure 2.

D. "Sponsor"

The EPA is a sponsor of an event if the agency provides funding or significant tangible support⁷ to a conference or appears as a sponsor on event materials. The EPA supports an event if the agency provides any funding through contracts and/or grants that capacitates the event – this does not include contract and/or grants utilized to support the ability for EPA to attend/participate at an event.

E. "Co-Host" or "Co-Sponsor"

For these events, the purpose of the conference is for multiple entities (federal and non-federal) to advance a mutual interest and develop products for common goals. Conference costs and decisions are shared among the parties to the conference, including agenda planning, speaker selection, location selection, and conference logistics.

⁷ "Tangible support" is the provision of financial assistance, material goods (i.e. an item(s) that EPA purchases, sells, or trades to or on behalf of the hosting entity), or services (i.e. services performed either by EPA staff or EPA's contractors on behalf of the hosting entity).

E. “Attended”

The EPA is solely attending an event when funds are not directly providing significant tangible support to the conference nor appearing in a manner that would make EPA appear either directly or indirectly as a sponsor/co-sponsor of the conference.

Fees may be subjected upon EPA when EPA opts to become an exhibitor or presenter at the conference. In such cases EPA must record the fees charged and have documentation ensuring the following:

1. The fees directly support EPA’s ability to present or exhibit.
2. Offset EPA’s incurred direct and indirect costs associated directly with our exhibit or presentation.
3. Determine if this changes EPA’s roles as attended/sponsored.

If the above criteria are not satisfied the event cannot be deemed an event in which EPA is an “attending” entity.

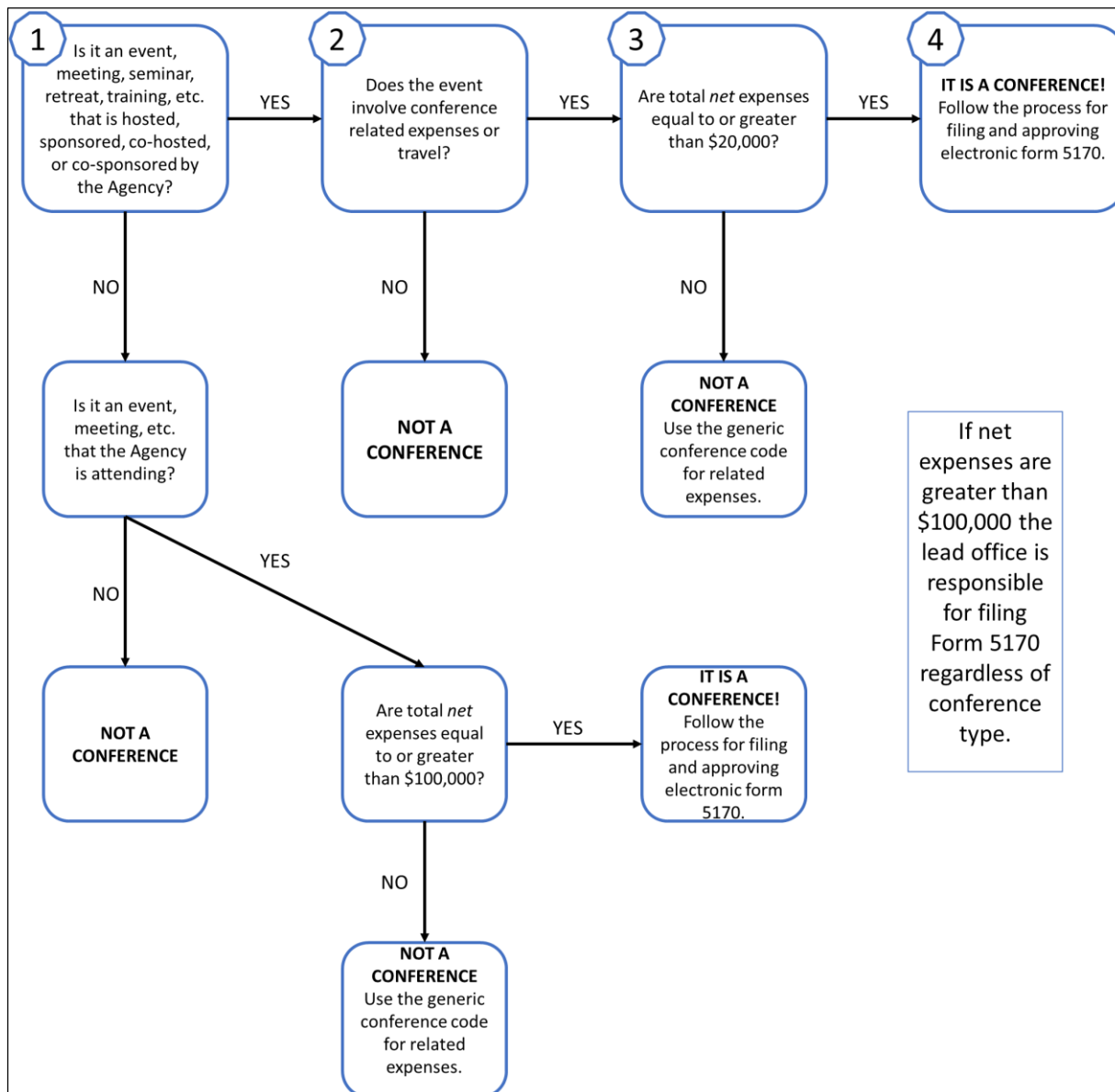
VI. Conference Procedures

A. Determination of a Conference

As discussed in Sections IV and V, a conference is an internal or external meeting, retreat, seminar, symposium or event [co-]hosted or [co-]sponsored by the EPA that involves \$20,000 or more in net expenses OR an event attended by the Agency that involves \$100,000 or more in net expenses. Conference approval must be received from the appropriate approval officials prior to obligation of conference expenses.

To determine if an event fits this definition, follow the decision tree outlined in Figure 1.

Figure 1: High Level Determination of a Conference



1. Determine if the EPA is a host or sponsor of the event.

Prior to obligating the agency to conference expenses, conference planners must seek the approval of approval officials. If an event forwards the agency mission and the agency expects to control content in the conference, it should be reportable as a conference. This usually includes any conference or event in which the EPA logo is displayed. See Figure 2 for an outline.

Figure 2: Whose Conference is it?

| | Purpose of Conference | Control | Attendees |
|---|---|---|--|
| (Co)Sponsored | <ul style="list-style-type: none"> - Advance the mission of the Federal agency where the non-Federal entity shares a mutual interest in the subject matter of the event and possesses expertise that adds substantive value to the purpose of the event; or - Develop products for goals common to the Federal agency and non-Federal entity. | <p>Decisions are shared among the parties to the conference, including control of:</p> <ul style="list-style-type: none"> - agenda planning, - speaker selection, - location selection, and - conference logistics. | Must be open to both Federal employees and members of the interested public. |
| (EPA is Attending) A Federal Entity is Hosting | <ul style="list-style-type: none"> - Discuss, evaluate, or plan a specific agency activity or program; - Advise the agency on its operations (e.g. FACA); - Solicit public or stakeholder input to official agency actions or policy; - Develop official agency positions; - Train agency staff or other direct implementers of agency regulations; - Generate information to be incorporated directly into official agency positions, such as policy, regulations, or guidance; - Propose, announce, or explain agency actions; or - Disseminate mandated information. | <p>The Federal entity expects to control:</p> <ul style="list-style-type: none"> - the agenda; - the selection of speakers, panelists, and/or attendees; and - the duration, date, and location of the meeting. | May be open to both Federal employees and members of the interested public. |
| (EPA is Attending) A Non-Federal Entity is Hosting | <ul style="list-style-type: none"> - Discuss, evaluate, or plan the non-Federal entity's initiatives; - Share information on issues of interest to the non-Federal entity; - Support or stimulate public awareness of the non-Federal entity's issues; - Facilitate informed public dialogue on issues of interest to the non-Federal entity; - Enhance management of programs of the non-Federal entity; or - Fundraising. | <p>The non-Federal entity expects to control:</p> <ul style="list-style-type: none"> - the agenda; - the selection of speakers, panelists and/or attendees; and - the duration, dates, and location of the meeting. | May be open to both Federal employees and members of the interested public. |

2. Determine if Proposed Expenses are Conference-Related

An event is defined as a “conference” if it meets the definition in Section V.A, regardless of whether it is called a “formal conference,” “EPA Employee Training Workshop,” “Awards Ceremony,” or any other name. Statutes, regulations, and Comptroller General Opinions distinguish among many different types of events, but not all terms are defined and not all sources are consistent.⁸ What constitutes a conference is a fact-based determination based on the established criteria in this guidance.

Conferences typically involve topical matters of interest to, and the participation of, multiple organizations, agencies and/or nongovernmental participation. Indicators of a formal conference often include but are not limited to registration, a published substantive agenda, and scheduled speakers or discussion panels. Individual events may qualify as conferences without meeting all of the indicators listed above, but will generally meet some of them.

Local conferences within the local duty location that do not require travel may also qualify as a conference if the event exhibits other key indicators of a conference, especially the payment of a registration, exhibitor, sponsor, or conference fee.

3. Determine a Rough Order of Magnitude Estimate of Proposed Conference Expenses

Since conference reporting is limited to events with total net expenses greater than \$20,000, conference planners should do a cursory analysis to determine if the event might have net expenses above the \$20,000 conference reporting threshold. For guidance, see GAO’s Cost Estimating and Assessment Guide⁹, particularly pages 34 – 36, regarding rough order of magnitude estimates. The rough order of magnitude estimate should act as your event’s budget and could include estimates of total number of travelers, facilities required, and other expenses based on past events or simple market research. If the event has potential costs/budget approaching \$20,000, planners should proceed towards obtaining conference approval.

B. Procedures for Obtaining Conference Approval

Any event which meets the above definition of a “conference,” with total net expenditures greater to the EPA than \$20,000, must receive approval from the relevant approval official prior to obligation of the conference-related expenses. For conferences sponsored or attended by multiple EPA organizations, the lead organization¹⁰ is responsible for conference approval and reporting. A list of approved conferences along with their designated project codes can be found on the conference website, and on the Conference Spending Request Form located respectfully at

⁸ A “conference” is defined in the Federal Travel Regulations as “[a] meeting, retreat, seminar, symposium, or event that involves attendee travel. The term ‘conference’ also applies to training activities that are considered to be conferences under 5 CFR 410.404.” However, this definition is only a starting point.

⁹ Government Accountability Office, “Cost Estimating and Assessment Guide,” GAO-09-3SP, March 2009. <http://www.gao.gov/assets/80/77175.pdf>

¹⁰ The “lead organization” is typically the one contributing the most funds, but may also be the organization with primary responsibility for logistics.

<http://intranet.epa.gov/ocfo/conferences/index.htm> , under ‘project codes’, and <https://ocfosystem1.epa.gov/ConferenceSpending/login> under “All Requests”.

[FTR §301-74.14](#) requires offices to perform a cost analysis for three alternative conference sites when the number of travelers is 30 or more. Offices should submit a memorandum approving the travel of 30 or more people to a conference. If a conference receives approval via Form 5170, the organization does not need to submit the 30 person memorandum. However, the Form 5170 should include the required elements of that memorandum as attachments, such as cost analysis for three conference sites.

1. Form Initial Plan and Cost Estimates

Before obligations can occur, the completed and approved EPA Form 5170, *Conference Spending Request Form*¹¹, must be received by OCFO and the relevant Contracting Officer or Purchase Card Holder must be sent verification of approval¹². To begin preparing the Form 5170, the conference planner must develop information for the proposed conference, such as conference location, estimated travel budget, and contract costs. The estimates/budget in EPA Form 5170 provides information that enable EPA Senior Managers to make informed decisions on the relative merits of the conference. EPA Form 5170 should be incorporated into the organization conference planning process to ensure timely reviews/approvals.

2. Approval Timing

Conferences must be approved *before* expenses can occur. Organizations should not finalize conference plans or make any commitments to vendors or hotels that obligate the government to pay funds until the requisite approval from the appropriate approval authority has been obtained. Further, EPA organizations should not enter into a co-sponsorship relationship, no cost contract, or other arrangement with a non-Federal entity until the requisite approval has been obtained.

In the case of more complex conferences, it may be difficult to get accurate estimates prior to obligation: an approving official may want more developed and precise cost estimates before approving an event, but contractors may be necessary before obtaining those estimates¹³:

- a. For conferences greater than \$100,000, prepare a memorandum of intent from the AA/RA to the Deputy Administrator with a purpose, justification, proposed budget, and other available information. Upon receipt of estimates, a Form 5170 should be prepared and approved by the AA/RA, and Deputy Administrator.

¹¹ The EPA Form 5170 is referred interchangeably as “EPA Form e-5170.” EPA Form e-5170 is used to differentiate between the paper form that was originally used. In this document, EPA Form 5170 refers to the electronic form unless specifically stated.

¹² Verification can be obtained by the Contracting Office or Purchase Card Holder by accessing the Conference Spending Request Form, therefore physical submittal of verification may not be required depending on your office’s internal business processes.

¹³ An office may choose to utilize a current contract vehicle or task order to assist in calculating estimates, for example using the current conference contract to provide budget estimates for next year.

3. Complete EPA Form 5170

The EPA Form 5170 is the designated form for receiving conference approvals from EPA Senior Officials. An EPA Form 5170 is submitted via an electronic workflow process, and is available at <https://ocfosystem1.epa.gov/ConferenceSpending/login>.

The EPA Form 5170 documents estimated costs of conference-related expenses and documents qualitative assertions and narratives, and should include sufficient detail to demonstrate the reasonableness of the conference to someone with no prior knowledge. For example, the EPA Form 5170 package could include Independent Government Cost Estimates, contract or work assignment numbers (if conference is part of a larger contract), associated grant numbers, conference itineraries, agendas, menus, descriptions of entertainment, speakers, venue selection criteria, attendance rosters.

Appendix 2 contains extensive detail on preparing the EPA Form 5170. For additional information on using the EPA Form 5170 tool, please consult Appendix 6.

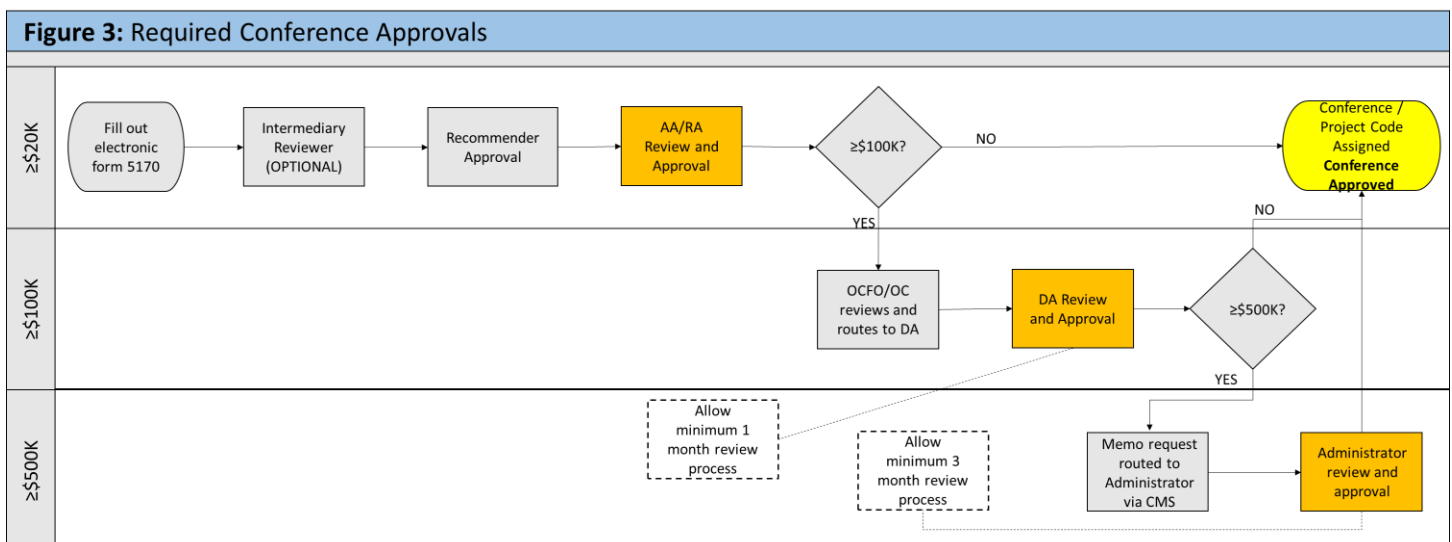
4. Obtain Electronic Signature from Approval Official

a. Determine Appropriate Approval Official

At a minimum, each conference over \$20,000 must have the approval of the AA/RA from the lead EPA organization, this currently cannot be delegated. Additional approvals may be required if the conference crosses the cost thresholds outlined in Figure 3.

The electronic EPA Form 5170 workflow will route the package to the appropriate official(s). However, some organizations may want to supplement approval packages through offline briefings. As a best practice, events with expenses under, but close to, the next highest approval threshold should consider submitting the event for approval as a precaution against cost overruns and retroactive approvals.

Approval official authority may not be re-delegated.



b. Workflow of the EPA Form 5170

The conference approval process is initiated by the originator (usually the conference planner). The originator enters and submits the required conference data into the EPA Form 5170. After review by an optional Intermediary Reviewer, the form is then reviewed by the “Recommender,” who is someone empowered with the ability to review and recommend documents for the AA/RA. If the net cost of the conference is greater than \$20,000 and less than \$100,000, the AA/RA is the final approval official.

If the conference is equal to or greater than \$100,000, the EPA Form 5170 must be approved by the Deputy Administrator. After the conference has been approved by the AA/RA, the EPA Form 5170 is routed to OCFO for processing through the Deputy Administrator’s Office. Please allow at least one month of processing time for conferences requiring the approval of the Deputy Administrator.

Conferences with net expenses greater than \$500,000 are prohibited without a signed public waiver from the EPA Administrator, in addition to the approval by the relevant AA/RA and the Deputy Administrator. In these cases, OCFO will provide a template justification memorandum for the AA/RA to send to the Administrator documenting the exceptional circumstances for the conference. This memorandum will be uploaded into the Correspondence Management System by the Office of the Controller and/or Deputy Administrator’s office for routing to the Administrator for approval.

Organizations should be aware that it can take upwards to three months between the approval of your AA/RA and submittal to OCFO to obtaining the Administrator’s approval. Offices should take special care in factoring this time into their conference planning as an event \$500,000 or greater can only be obligated after the Administrator has authorized the event.

In all cases, OCFO will assign each event a conference project code for organizations to track expenses after the approving official has electronically approved the event. Obligations for the conference can begin upon receipt of approval from the appropriate approval official *and* a conference project code has been assigned.

5. Accounting Codes for Conferences: Compass site/project field

Project codes are to be included on all conference related funding documents to **track and monitor conference spending**. A conference project code must be assigned to all approved conferences prior to obligating Agency funds¹⁴. Additionally, all conference related travel must include a conference project code.

¹⁴ Exceptions for using conference project codes.

1. Superfund site charges related to conferences will use established site-specific project codes.
2. Oil site charges related to conferences will use established site-specific project codes.
3. IT programs that are capitalized in Compass should use the IT project code.
4. Working Capital Fund costs that are conference-related will use a WCF conference project code.

Upon approval of the event, the conference approving system will send a receipt to the originator with notification of conference approval and the conference project code. It is the responsibility of the originating office to distribute and/or notify FCOs, CORs, Task Order Managers and others whose tasks may depend upon the utilization of the conference code to track Agency expenditures. OCFO maintains a list of the agency's conferences and assigned project codes within the Conference Spending Request Form under "All Requests".

6. Report major changes or cost escalations

Any substantive change which might affect an approving official's opinion of the conference should be reported immediately to the approving official and OCFO. Examples could include location changes, major costs escalations (especially if exceeding the next conference reporting threshold), or major agency changes. In these circumstances, if the conference has not undergone obligation, a new electronic Form 5170 should be submitted; if obligations have already occurred you should report such escalation to your approving official and OCFO.

C. REPORTING ACTUAL CONFERENCE DATA

1. Conference Notification to OIG

Within 15 calendar days following the **conclusion** of the conference, for events hosted or sponsored by the Agency, the Senior Resource Official (or their designee), or the Originator of the hosting or sponsoring EPA office must submit a report to the Office of Inspector General via the Conference Spending Request Form. Electronic reports include:

- a. Conference name
- b. Beginning and end date of the conference, typically the dates of physical collocation of conference attendees
- c. Location (city and state)
- d. Number of EPA employees who attended.

To submit an OIG report, log into the Conference Spending Request Form; access your event by using the "All Request" report; open your event and update the applicable fields; submit OIG report by pressing the "Submit to OIG" button. Note: Only submit an OIG report after your event is approved and after the event has concluded. For additional information on the OIG report please see Appendix 6 Part B.

The Originator and Recommender will receive an automated notification from the Conference Spending Request Form 10 days after the conclusion of the event reminding them to submit the required information.

Submission of the OIG report does NOT complete nor reconcile your 5170s actuals, this is a separate action – for information on completing your 5170 and submitting actuals, reference Section 2 "Conference Approvals – Actual Expenses" below.

2. Conference Approvals - Actual Expenses

a. *General Policy.*

Within 91 calendar days of the conclusion of the conference¹⁵, the primary EPA organization hosting, sponsoring, or attending the conference must modify, complete, and submit the EPA Form 5170A. The Form 5170 only provides estimates; the Form 5170A updates the existing 5170 with the actual expenses incurred. Since the EPA Form 5170A is built into the EPA Form 5170, organizations must modify, update, and complete the remainder of their original EPA Form 5170 prior to completing the Form 5170A.

b. *Information requested.*

OCFO requires data updating the information submitted in the EPA Form 5170, as well as supplemental information that can be used to validate cost data. This information is necessary in order to meet reporting obligations to OMB and the public. For conferences with net expenses \$100,000 and above, this supplemental information should include:

- i. A validated list of travelers with expenses paid by the EPA. This list should distinguish between EPA employees and non-EPA employees with expenses paid by the agency. At a minimum, organizations should ensure the total costs and number of travelers are accurate.
- ii. Contract, grant, interagency agreement, or miscellaneous obligation numbers¹⁶ associated with expenses tied to the conference.
- iii. Conference agendas, if applicable, and any public websites used to promote the conference.
- iv. A brief statement on how the conference forwarded the mission of the agency.
- v. A discussion of the methodology used to determine which costs relate to the conference.
- vi. A description of the contracting procedures used, including whether contracts were awarded on a competitive basis; and a discussion of any cost comparison conducted by the organization in evaluating potential contractors for the conference.

For conferences with net expenses \$500,000 and above, a copy of the waiver signed by the Administrator must be included with the EPA Form 5170A submission.

c. *Procedures if actual costs exceed estimates.*

If actual expenses are below the initial estimate provided in EPA Form 5170, the conference does not require any additional approvals. However, if an EPA organization hosts a conference and the organization either (a) does not submit an

¹⁵ Or in advance of OCFO's mid-December call for conference certification, whichever may come first.

¹⁶ Any cost outside of travel and not on a contract. E.g., purchase card transactions, rental space outside of a contract.

EPA Form 5170 prior to obligation of conference expenses; or (b) exceeds the approved dollar amount of the EPA Form 5170 package, the EPA Form 5170A must be signed by the AA/RA for that organization, and include an explanation of the nature of the unapproved expenses and a justification for why these expenses were deemed necessary.

If a conference exceeds \$100,000 without proper approval, the AA/RA for that organization must submit a memorandum to the Deputy Administrator explaining the nature of the unapproved expenses and a justification ([Supplemental Form](#)) for the reason these expenses were deemed necessary. The memorandum should be included as part of the submission of EPA Form 5170A. The Form 5170A must also be signed by the appropriate AA/RA.

These approvals may not be delegated.

3. Year-End Certification

Every year, OCFO will issue a certification memorandum requesting AA/RA review along with a specified due date usually set for Mid-December. The AA/RA by their signature is certifying that the published list in its entirety is complete and accurate. If an organization finds that the certification memorandum is not complete or accurate, they should notify OCFO for next steps and/or submit the necessary corrections and documentation via the EPA Form 5170A.

Conferences with net expenses \$100,000 and above will be reported to the OIG, OMB, and published publicly on the EPA website.¹⁷ As part of the year-end certification for these conferences, organizations must include an attachment that lists the following information:

- a. Total conference expenses incurred by the agency for the conference.
- b. Location of the conference.
- c. Date(s) of the conference.
- d. Brief explanation how the conference advanced the mission of the agency.
- e. Total number of individuals whose travel expenses or other conference expenses were paid by the agency.
- f. Discussion of the methodology used to determine which costs relate to the conference.
- g. Description of the contracting procedures used including—
 - i. Whether contracts were awarded on a competitive basis; and
 - ii. A discussion of any cost comparison conducted by the departmental component or office in evaluating potential contractors for the conference.

¹⁷ Includes events “attended” by the Agency.

VII. Roles and Responsibilities

1. Administrator

The Administrator reviews waiver requests for conferences seeking exceptions to be made from the statute which prohibits conferences with net expenses \$500,000 or above.

2. Deputy Administrator

The Deputy Administrator oversees EPA's conference policies and controls and maintains visibility and accountability for the conduct of conferences hosted by the agency and attended by agency employees through continuous reporting and escalation procedures for unusual circumstances.

The Deputy Administrator reviews and authorizes conference proposals with net expenses greater than \$100,000.

3. Assistant Administrators and Regional Administrators

AAs/RAs must sign an Electronic EPA Form 5170 prior to obligation of funds for each conference with net expenses greater than \$20,000, and must ensure compliance with all applicable law and policy in making their authorizations. AAs/RAs should also maintain electronic records of documentation used in making their decisions. Additionally, if, as the date of the conference approaches, it becomes apparent that its cost will exceed the estimated cost and breach the next higher approval threshold, approval must be obtained from the higher level approval authority as soon as possible.

After the conclusion of the conference, the AA/RA is responsible for ensuring timely submission of a Form 5170A, which reports actual conference expenses after the occurrence of the event. Additionally, each RPIO is responsible for reporting to the Inspector General within 15 days of the conclusion of any conference or conference-related activity incurring \$20,000 or more which the Agency hosted, co-hosted, sponsored, or co-sponsored.

a. *Assess conference alternatives.*

When making conference approval decisions, approval authorities must confirm that physical collocation of EPA employees in a conference setting is necessary and cost-effective and consider alternative means of delivering the relevant information, including usage of remote collaboration tools (e.g., teleconferencing, videoconferencing, webinars, online sharing applications) and other real-time communication methods that would mitigate the need for physical collocation of EPA employees.

When physical collocation is determined to be necessary and cost-effective, approval authorities must ensure the agency is maximizing the use of government-owned space.

b. *Assess reasonableness of conference expenses.*

AAs/RAs must confirm that event expenses are necessary and reasonable, and that all aspects of the event portray the agency in a positive light. Common sense and good judgment must be used throughout the conference planning process: an expense could be appropriate in one instance where it is directly relevant to the conference purpose, and inappropriate in another instance where is not germane to the purpose of the conference.

Entertainment-related expenses are expressly prohibited as part of EPA conferences, and approval authorities must ensure that funds, including those paid through travel disbursements or conference fees, are not used to pay such expenses.

c. *Ensure conferences are approved prior to obligation.*

Organizations must not finalize conference plans or make obligations of appropriated funds until the requisite approval from the appropriate approval authority has been obtained. The approval authority shall exercise continuing conference oversight as necessary to ensure that the entire conference is being carried out in a manner that is fully consistent with this guidance.

d. *Certify accuracy of year-end total conferences and related expenses.*

In order to meet reporting requirements to OMB, OIG, and the public, AAs/RAs must provide a certified list of conferences from the prior fiscal year no later than the proscribed due date provided by OCFO following the end of that fiscal year.

4. Senior Resource Officials

- a. Serve as EPA's primary points of accountability charged with strengthening Agency-wide fiscal resource management practices.
- b. May submit reports to the Office of the Inspector General within 15 calendar days of the final day of the occurrence of the conference¹⁸. See Section VI, Reporting, for further details.

5. Office Directors and Chiefs of Staff

- a. Serve as "recommenders" for EPA Form 5170, by assuring to the AA/RA that the statements and cost information in the conference package is accurate and complete.
- b. A "recommender" can be added to the system by contacting the OCFO/OFM conference point of contact – see Conference Website for current contact(s) - with

¹⁸ In many cases this role of submitting the OIG report is delegated to an individual within the original approval chain or an authorized staff member of the originating office – we leave it open to the originating office's own judgement as to who should submit.

the individual's first and last name. The email should also confirm that the requested person(s) is authorized to send communiques to their respective AA/RA.

6. Conference Planners

- a. In accordance with the Deputy Administrator's May 23, 2012 Memorandum "Promoting Efficient Spending to Support Agency Operations: Conference Spending," and OCFO's April 14, 2013 memorandum "Updated Guidance on Conference Reporting," conferences with expenses in excess of \$20,000 must submit a signed EPA Form 5170 before obligation of conference funds.
- b. Distribute conference materials to other EPA offices attending the conference, namely the Compass project code for use by Funds Control Officers. In addition, conference planners should include planning information such as agendas, travel and lodging information.
- c. After conclusion of the event, coordinate compilation of cost and attendance information for OIG reports within 15 days of the conference end date, and submit an EPA Form 5170A within 91 days of the conference end date.¹⁹

7. Funds Certifying Officials

- a. Certify funds in Compass using the Compass Project Field for conferences. See Appendix 5.
- b. Monitor the unique conference code report located on the conference website to identify approved conferences and project codes for their respective organizations.

8. Contracting Officers

- a. Ensure EPA Form 5170 has been completed and approved prior to obligations of EPA funds. Until EPA Form 5170 has been approved per these instructions and received by OCFO and the Contracting Officer/Purchase Card Holder, conference-related obligations are prohibited.
- b. Ensure EPA acquisitions follow applicable laws and regulations.

9. Staff Directors, Chiefs of Staff, Special Assistants, Team Leaders, and Other Designees

- a. Provide a flexible, extra optional layer of review for those programs that wish to utilize.
- b. Serve as intermediary reviewers - an optional reviewer who acts as a liaison between the Originator of the 5170 and Recommender. The term "Other Designates"

¹⁹ As noted in previous sections, events "attended" by the Agency are not required to file the 15-day OIG report, nor is an "attended" event required to file an electronic 5170/5170A if the costs to the Agency is below \$100,000.

identifies individuals selected within the respective programmatic office's business process to serve in this capacity. Individual offices determine if and how to utilize the intermediary reviewer in their business processes.

An "intermediary reviewer" can be added to the system by contacting [OCFO's Office of Financial Management's conference contact\(s\)](#) with the individual's first and last name.

10. Office of the Chief Financial Officer

- a. Manages and implements conference policies and procedures on behalf of the Deputy Administrator. Maintains a conference website which displays current policies and procedures.
- b. Collects conference approvals via the EPA Conference Spending Request Form. Maintains records and data.
 - i. For conferences above \$100,000, OCFO provides a high-level executive summary on the conference for the Deputy Administrator's office, ensures timely approval, and coordinates as appropriate.
 - ii. Ensures conference packages have sufficient detail to demonstrate assertions listed in the Form 5170.
 - iii. Maintains template conference waiver requests for use of offices wishes to request exemption from the prohibition on conferences with net expenses greater than \$500,000.
- c. Assigns Compass conference project codes and displays them on the OCFO website.
- d. Notifies EPA organization of the requirement to report to OIG within 15 calendar days of the conference.
- e. Collects actual conference data via EPA Form 5170A. Follows up for required approvals as appropriate.
- f. Prepares the annual report to OMB and the public. In accordance with OMB M-12-12, the EPA prepares the following data for an annual public report for conferences which the agency *hosts* where the total expenses associated with the conference are in excess of \$100,000. This data will be captured by the Responsible Planning and Initiation Office and consolidated by OCFO.
 - i. The total conference expenses incurred by the agency for the conference;
 - ii. The location of the conference;
 - iii. The date of the conference;
 - iv. A brief explanation how the conference advanced the mission of the agency; and
 - v. The total number of individuals whose travel expenses or other conference expenses were paid by the agency.

Appendix 1: Checklist for the EPA Conferences

The review and approval of conferences must follow policy established by the Federal Government, the EPA, and traveler's organization. It is recommended the checklist be maintained in the files of the respective organization.

Conference Policy Checklist

Authorizations

- ☐ **Determine if an event falls under the "conference" definition**
 - Hosted/co-hosted, sponsored/co-sponsored, attended by EPA
 - Involve conference related expenses or travel?
 - Total net expenses greater than or equal to \$20,000; or if attended greater than or equal to \$100,000
 - Grant expenses, offsetting fees (e.g. registration fees) not included
 - (If applicable) Exceptions
- ☐ **Prepare Conference Package for Approval**
 - Form Initial Plan & Cost Estimates
 - Complete EPA Form 5170
 - Determine appropriate approval official
 - \$20,000 - \$100,000: AA/RA
 - \$100,000 - \$500,000: Deputy Administrator
 - \$500,000+: waiver required from the Administrator
 - Attach relevant documentation to the approval request
- ☐ **Obtain Conference Accounting Codes**
 - Upon approval by Approving Official, OCFO will distribute the code to conference planner
 - Recurring conferences and codes for non-conference travel are found on the OCFO Conference Spending Request Form website and the OCFO Conference Website.
 - If conference spans multiple offices, distribute the code with materials to attending offices.
- ☐ **Hold conference**
 - Track number of agency attendees and conference expenses

Report Actual Expenses

- ☐ **Within 15 days:** Report to OIG with name, date, location, number of attendees via the electronic Conference Spending Request Form.
 - Submittal Procedure: Access submitted event; update appropriate fields; read certification note; press "Submit to OIG."
- ☐ **Within 91 days:** Complete EPA Form 5170-A with actual expenses
 - Conferences exceeding original estimate/budget must be signed again and will automatically route through the approval chain.
 - Submittal Procedure: Access submitted event; update all fields with actual data; press "Conciliate" button to reconcile the form.
- ☐ **Mid-December:** Certify accuracy and completeness of conferences and expenses for the year.

Things to Keep in Mind

- ☐ Is collocation necessary?
- ☐ Use EPA or government space when available
- ☐ Ensure all spending is necessary and reasonable (e.g., no entertainment expenses)
- ☐ Do all aspects of the event positively represent EPA to the public?
- ☐ Does this event advance or support the EPA mission?

Appendix 2: Form 5170 Data Elements

1. Originating Office

- a. AA'ship: the lead RPIO (HQ program, Region) responsible for hosting/sponsoring/attending the conference. The lead AA'ship is usually the one committing the most funds.
- b. Office: an organization below the AA'ship, e.g. allowance holder. This is not a mandatory field.
- c. Contact (First and Last Name): Name of the person who should be contacted in the case of follow-up questions. This does not have to be the same person as the originator.
- d. Email & phone: Contact information for the above mentioned contact person

2. Conference Details

- a. Name of Event: The name of the conference. The conference should use appropriate conventions in naming the event: from an outsider's perspective, the name should clearly and succinctly demonstrate the purpose of the conference and create a positive overall impression of the agency.
- b. Location: At a minimum, the city and state should be listed. If applicable, the name of the facility should be included as well.
- c. Start/End Date: The first and last date of the conference. This usually is the date of physical collocation of conference participants.
- d. Number of Attendees: The total number of attendees to the event. This information is often, but not always, collected through registration, travel authorizations, and/or meeting minutes.
 - i. EPA attendees: the number of EPA employees in attendance.
 - ii. Non-EPA attendees: number of non-EPA employees in attendance.
- e. Purpose: a brief explanation of the intended goal of the conference, and how the conference advanced the mission of the agency.

3. Cost Data

| 5170 Expense Categories | Sub-Category | Definition | FOC /SOC number(s) | Title of FOC/SOC |
|---|---|--|---|--|
| Facility | Training Facility | Cost associated with training facilities (when necessary) – training designation requires approved SF-182. | 2501 2502 | Training – Admin Training – Prog |
| | Room Setup Costs | Cost associated with maintaining and modifying a site so that it is suitable for the conference (e.g., tables, chairs). | 2330 2350 2583 | Equipment Rental – Admin Equipment Rental – Prog Other Programmatic Contracts |
| Audio Visual Equipment | A/V | Costs associated with acquiring communication and visual technology for the conference | 2335 2337 2345 2346 2347 2348 2617 2625 | Telephone Service – Voice Analog Telephone Service – Data and VOIP Telecom Equip, Voice Analog – Admin Telecom Equip, Voice Analog – Prog Telecom Equip, Data/VOIP – Admin Telecom Equip, Data/VOIP – Prog IT & Telecom Supplies – Admin IT & Telecom Supplies – Prog |
| Training | Training Costs | Costs associated with approved SF-182, including workshop/course costs and books. | 2501 2502 2591 2592 | Training – Admin Training – Prog Commercial IT Training – Admin Commercial IT Training - Prog |
| Travel ²⁰ | Travel | Costs associated with EPA employees travelling to a conference-related activity: flight, lodging, transportation, per-diem, and any other cost that would be part of a travel authorization or voucher. | 2100 series | Travel and Transportation of Persons (related to EPA employees) |
| | Training Costs | Costs associated with approved SF-182, including per diem, lodging and hotel tax. | 2501 2502 2591 2592 | Training – Admin Training – Prog Commercial IT – Admin Commercial IT Training - Prog |
| EPA-funded travel for non-EPA attendees | EPA-funded travel for non-EPA attendees | Costs associated with non-EPA employees that involve travel such as flight, lodging, transportation, per-diem, and any other cost that directly pertains to transporting the individual(s) to the event. | 2100 series (if on Invitational Traveler TA in Travel System) | Travel and Transportation of Persons (related to non-EPA employees); Invitational Travel. |
| Food | Food | Food, beverage, light refreshments or ethnic food samples. See EPA Order 1900.3 for limitations. Some food costs could be hidden in other contracts. | 2135 2615 | Meetings and Conference Subsistence (for meetings not approved as training) |

²⁰ Travel costs are inclusive of ALL EPA travel expenses regardless of what Region or Program office. The 5170 requires office's to report at the Agency level not at the individual programmatic level.

| | | | | |
|---|--|--|---|--|
| | | | | Supplies & Materials – Admin |
| Conference Planning Contracts | General Definition | A contract, interagency agreement, or professional support contract, etc. in which the agency enters into a binding agreement for said entity to provide EPA goods or services. This excludes facilitation, note taking, and technical work such as the creation of a scientific research paper that will be presented at the event. | | Contracts – Admin Contracts – Prog Interagency Agreements Brownfields Training Other Programmatic Contracts Management & Professional Support |
| | Facility | Contracts associated with rental of a facility to host a conference, or, cost associated with maintaining and modifying a site so that it is suitable for the conference (e.g., tables, chairs). | 2504 2505 | Contracts – Admin Contracts – Prog |
| | Audio Visual Equipment | Contract costs associated with acquiring communication and visual technology for the conference | 2583 | Other Programmatic Contracts |
| | Travel | Costs associated with contractors that involve travel such as flight, lodging, transportation, per-diem, and any other cost that directly pertains to transporting the contractor(s) to the event/pre-event. | 2504 2505 (if travel is part of contract) | Travel and Transportation of Persons (related to non-EPA employees); Invitational Travel. |
| | Supplies and Materials | Contractor costs associated with items of nominal value that are used in support of the event such as pens, paper, booth display items, conference materials, etc. | 2504 2505 2583 | Contracts – Admin Contracts – Prog Other Programmatic Contracts |
| | Shipping and Handling | Contractor cost associated with mailing or shipping supplies or equipment to/from the event | 2504 2505 2583 | Contracts – Admin Contracts – Prog Other Programmatic Contracts |
| | Promotional or Commemorative Items | Generally prohibited. Costs associated with contractor purchasing items such as (but not limited to) clothing, pens, mugs, cups, folders, folios, lanyards, and conference bags that are provided to conference attendees. | 2504 2505 2583 | Contracts – Admin Contracts – Prog Other Programmatic Contracts |
| | Other (Logistics, Registration, etc.) | Costs, other than above, associated with any coordination prior to, during, and following the event. | 2504 2505 2506 2526 2583 2584 | Contracts – Admin Contracts – Prog Interagency Agreements Brownfields Training Other Programmatic Contracts Management & Professional Support |
| Facilitation and Note-taking Contracts | Facilitation and Note-taking Contracts | Costs associated with support at the event for the purpose of keeping records or facilitating a discussion/process. This excludes conference planning and technical work such as the creation of a scientific research paper that will be presented at the event. | 2584 | Management & Professional Support |

| | | | | |
|---|------------------------------------|--|------------------------------|--|
| Promotional or Commemorative Items | Promotional or Commemorative Items | Generally prohibited. Costs associated with items such as (but not limited to) clothing, pens, mugs, cups, folders, folios, lanyards, and conference bags that are provided to conference attendees. | 2615 | Supplies & Materials – Admin |
| Supplies and Materials | Supplies and Materials | Costs associated with items of nominal value that are used in support of the event such as pens, paper, booth display items, conference materials, etc. | 2410 2411 2615 2616 | Printing & Reproduction – Admin Printing & Reproduction – Prog Supplies & Materials – Admin Supplies & Materials – Prog |
| | Shipping | Cost associated with mailing or shipping supplies or equipment to/from the event | 2220 2224 2334 | Transportation of Things – Admin Transportation of Things – Prog Postage/Mail (USPS only) |
| Other | Honorarium | Costs that would not be appropriate for the categories listed above. This includes things such as (but not limited to) sponsor fees, honorarium, speaker fees, etc. | 2504 2583 2584 2585 | Contracts – Admin Other Programmatic Contracts Management & Professional Support Studies, Analysis & Evaluation Consulting Services |
| | Peer Reviews | Cost associated with peer review consulting fees | 2585 | Studies, Analysis & Evaluation Consulting Services |
| | Conference Abstracts | Costs associated with conference abstract fees | 2410 2411 | Printing & Reproduction – Admin Printing & Reproduction – Prog |
| | Registration Fees | Cost of necessary expenses associated with registration fees that involve employee travel. Includes registration fees for conferences and training classes. | 2560 2561 | Registration Fees – Admin Registration Fees – Prog |

4. Questions

These four questions attest to the reasonableness of the event. The rest of the package should include information that demonstrates the accuracy of the answers to these questions. Attachments demonstrating the accuracy of the quantitative cost information as well as supplementary information for the below questions can be added using the “Upload Attachment” button further below on the form.

- a. *Is EPA space or other government space available?*

Per the Deputy Administrator’s November 22, 2011 memorandum [“Eliminating Excess Conference Spending and Promoting Efficiency in Government”](#), EPA organizations must maximize the use of government-owned space, and should use of EPA or federal space when available

b. *Is all of the spending necessary and reasonable?*

EPA must ensure that no Federal funds are used for unnecessary or inappropriate purposes and that all conference expenses and activities comply with both the FTR and FAR requirements. In addition, attendance and expenses should be limited to only the levels required to carry out the mission of the conference.

c. *Do all aspects of the event positively represent EPA to the public?*

In addition to expenses being necessary and reasonable, EPA must ensure there are no expenses that reflect poorly on the agency. Some examples include luxury or resort-like conference locations, conflicts of interest (in fact or appearance), engagement in partisan political activity, entertainment expenses, provision of food and beverage in accordance with EPA Order 1900.3.

d. *Does this event advance or support EPA's mission?*

The package should clearly state and provide evidence as to how the conference forwards the EPA mission.

5. Attachments and Comments

- a. There is space for up to five (5) attachments to demonstrate the accuracy of the qualitative and quantitative information provided on the Form 5170. Please consolidate attachments to the extent possible. PDF documents are strongly preferred.

Attachments can be replaced/updated at any time.

b. Cost Justification/Comments/Previous Comments:

- i. This space is provided primarily for cost justification by originators (required), comments by recommenders and approval officials on pending packages. However, it can also be used for high-level summaries of 2 sentences, or the equivalent of a post-it note.
- ii. The comment space has a total capacity of 5000 characters. If it goes above, the package will be frozen and unable to move forward.
- iii. After each level of approval, the package will be stamped with the date, time, and person, along with any comments. Each level starts on a new line.

Appendix 3: Authority

The following references can be used for specific areas. Conference Planners, Contract Officers, Task Order Managers, etc should be aware and familiar with the following laws, regulations, and policies that impact conference reporting and event organization.

Introduction

- EPA Best Practices Guide for Conferences
- A Collection of Federal Resources Relating to Conferences, U.S. Office of Government Ethics, September 2012.
<http://ogc.hqda.pentagon.mil/Documentation/EandF/Guidance/2012%20OGE%20Collection%20of%20Fed%20Resources%20on%20Conferences%20pdf.pdf>

Conference Requirements:

http://intranet.epa.gov/ocfo/management_integrity/conferences.htm

- OMB Memorandum M-12-12, "Promoting Efficient Spending to Support Agency Operations," May 11, 2012. This outlines new requirements to review and approve conferences over \$100,000 and report publicly.
 - OMB Controller Alert, August 31, 2012. Clarifies conference requirements.
 - OMB Controller Alert, December 12, 2012. Outlines public reporting requirements.
- Deputy Administrator Bob Perciasepe memorandum, "Promoting Efficient Spending to Support Agency Operations: Conference Spending," May 23, 2012.
http://intranet.epa.gov/ocfo/management_integrity/conferences/promoting_efficient_conference_spending.pdf. This memoranda implements OMB M-12-12 requirements.
- OCFO/OARM's memorandum, "Guidance for Eliminating Excess Conference Spending and Promoting Efficiency in Government" (June 13, 2012). Provides further detail and implementing guidance for the Deputy Administrator's memorandum.
- P.L. 113-6, Section 3003. The FY 2013 Continuing Resolution.
<http://www.gpo.gov/fdsys/pkg/BILLS-113hr933enr/pdf/BILLS-113hr933enr.pdf>
 - OMB Controller Alert, May 28, 2013. Reminds agencies of reporting requirements from P.L. 113-6.

Requirement for a Memo for Conferences with 30 people or more attending:

- EPA Resource Management Directive System 2550B, Official Travel, pp. 27-28 (<http://intranet.epa.gov/ocfo/policies/resource.htm>).
- Office of the Comptroller Policy Announcement 94-10.

Travel:

- Federal Travel Regulation (<http://gsa.gov/fttr>)
 - Chapter 301-74, Conference Planning.
 - Chapter 301-10.300, Use of Privately Owned Vehicle.

- Office of Management and Budget guidelines (http://www.whitehouse.gov/omb/circulars_default).
- United States Code, Title 5 *Government Organization and Employees*, specifically Chapter 57, provides allowances for travel, transportation and subsistence (<http://uscode.house.gov/download/pls/05C57.txt>).
- EPA Resource Management Directive System 2550B, Official Travel (<http://intranet.epa.gov/ocfo/policies/resource.htm>).

Food:

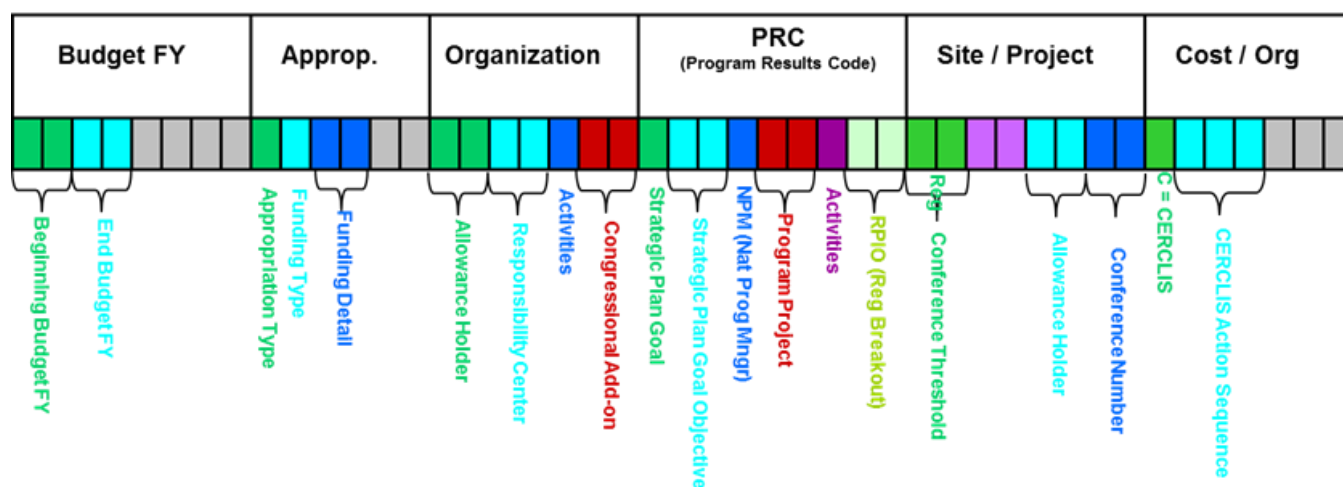
- Federal Acquisition Regulation (<https://www.acquisition.gov/far/>).
- *EPA Order 1900.3, Food at an EPA Conference, Workshop, Ceremony, Reception or Observance*, (http://intranet.epa.gov/ohr/rmpolicy/ads/orders/1900_3.pdf), November 22, 2006 (Revised September 18, 2012). This includes requirements for prior approval of food purchases and restrictions on the use of agency funds to purchase food for non-federal conference participants. These requirements are also prescribed in the *EPA*.
- OW and OARM Memorandum, *Reducing Waste and Protecting the Environment by Reducing the Use of Single-Serving Bottles of Water*, December 2, 2011 (<http://purchasecard.epa.gov/files/OW%20and%20OARM%20Memo%20on%20Reducing%20EPA%20Use%20of%20Bottled%20Water%20December%202,%202011.pdf>).
- Office of General Counsel's "Frequently Asked Questions on Food and Light Refreshments" (<http://intranet.epa.gov/ogc/memoranda/meals.pdf>).

Contracts/Purchase Cards:

- FAR
- EPA Contracts Management Manual http://oamintra.epa.gov/files/OAM/cmm_0_0.pdf
 - Section 13.3, Using the Government wide Commercial Purchase Card (http://purchasecard.epa.gov/files/Purchase_Card_Policy2006.pdf).

Appendix 4: Conference Project Field

EPA Account Code Structure



Project Field for Conference Tracking



| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|--|--|---|--------------------|-----------------------------------|-----------------------------------|---|-----------------------------|
| Project type: • CN=Conference • IT= IT Conference • NC= Non-Conference This character will always be M | Magnitude of conference: E= exempt S=20k-100K M= 100k-500k L=500k+ Z= external N= non-conference travel | 1st RPIO character | 2nd RPIO character | 1st character of Allowance holder | 2nd character of allowance holder | 1st character of conference Project Group descriptions: • AEC= Annual External conference • INC =EPA conference • NCT= Non-conference Travel | 2nd character of conference |
| M | S | 1 | 7 | 1 | 7 | A | 1 |
| Project Type roll up | Magnitude (project category rollup) | Initiator (RPIO+AH) (project class rollup) – specific list of allowable RPIO/AH combinations | | | | Conference number (project Group rollup) established by OCFO | |

Dimensions/roll-ups in Compass (Type, Category, Class, Group) are used for defining data elements and reporting.

The conference code will be in Compass and used on all transactions from feeder systems exc site travel. All conference costs reported using this number.

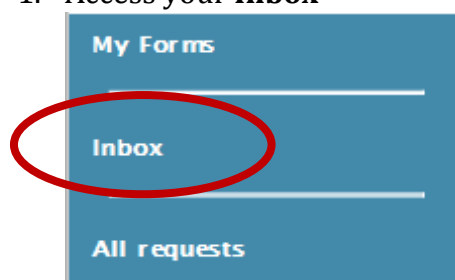
Appendix 5: How to Request/ How to Submit OIG Report/ How to Reconcile

A. How to Submit and Approve an Event

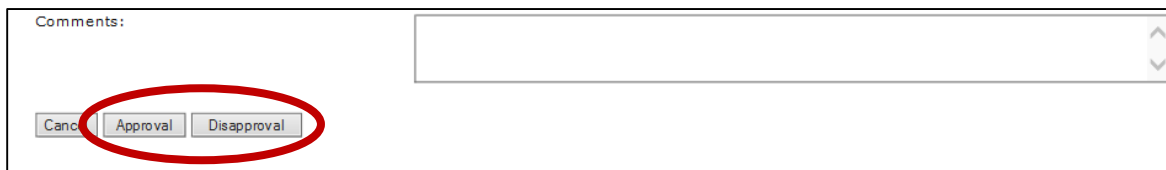
To submit an event for approval that is over \$20,000²¹ press the “New Request” button found on you’re **My Forms** page. Note: When entering in numerical data elements DO NOT use special characters (i.e. dollar (\$), comma (,), percentage (%), number (#), etc.); decimals however are accepted.

To approve an event:

1. Access your **Inbox**



2. After reviewing the event press **Approval** to approve; press **Disapproval** to reject the event.

A screenshot of a form for reviewing an event. It features a 'Comments:' label, a large text input area with a vertical scrollbar, and three buttons at the bottom: 'Cancel', 'Approval', and 'Disapproval'. The 'Approval' and 'Disapproval' buttons are circled in red.

²¹ Note if the event is one in which EPA is “Attending” you only need to submit an electronic 5170 when your budget is expected to be \$100,000 or greater.

B. How to Submit an OIG 15 Day Report

Fifteen (15) calendar days after the conclusion of your event over \$20,000 you are required to submit a 15-day OIG report for events hosted/co-hosted or sponsored/co-sponsored by the EPA²². There are two way to submit the OIG Report

1. You are the Originator, Intermediary Reviewer, or Recommender

- a. Under **My Forms** select the event submitted/approved by clicking on the **ID** link.
- b. Update the following fields:
 - i. Name of Event
 - ii. Location
 - iii. Start Date and End Date
 - iv. Number of Attendees

Conference Details


| | | | |
|----------------------|--|----------------|---|
| * Name of Event: | <input type="text" value="2014 Energy Star Products Meeting"/> | * Location: | <input type="text" value="Scottsdale"/> |
| * Start Date: | <input type="text" value="2014-10-27"/> | * End Date: | <input type="text" value="2014-10-29"/> |
| Number of Attendees: | <input type="text" value="0"/> | * Non-Federal: | <input type="text" value="508"/> |
| * Federal (Non-EPA): | <input type="text" value="0"/> | | |
| * EPA: | <input type="text" value="15"/> | | |

- c. Read the Certification Statement found at the bottom of the page.
- d. Press the OIG Button

By pressing submit you will be sending a report to the OIG to meet your statutory 15 day reporting requirement. In addition you, the originator, on behalf of your office hereby certify that: "I have submitted the proper report to the OIG pertaining to this respective conference and that I have updated the number of attendees, location, and dates of the conference and what has been submitted is complete and true."

- e. Read the Warning Box. If the information entered is correct press OK.

Message from webpage

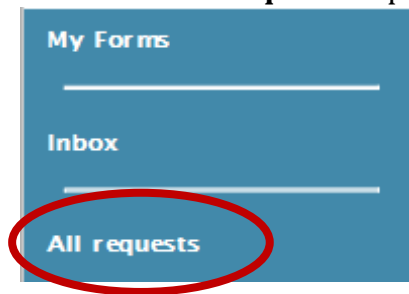
 **WARNING!** You are about to submit an official report to the OIG as required by statute! Please ensure the number of ATTENDEES, LOCATION, DATES, and NAME of the conference are accurate. Press OK to submit or otherwise CANCEL.

- f. If the OIG report was submitted successfully, a "Yes" will appear under the OIG Report Submitted Column.
- g. A null space (i.e. blank) indicates the report was not submitted.
- h. A "N/A" (i.e. non-applicable) indicates the event was marked as "Attended" and does not require an OIG report.

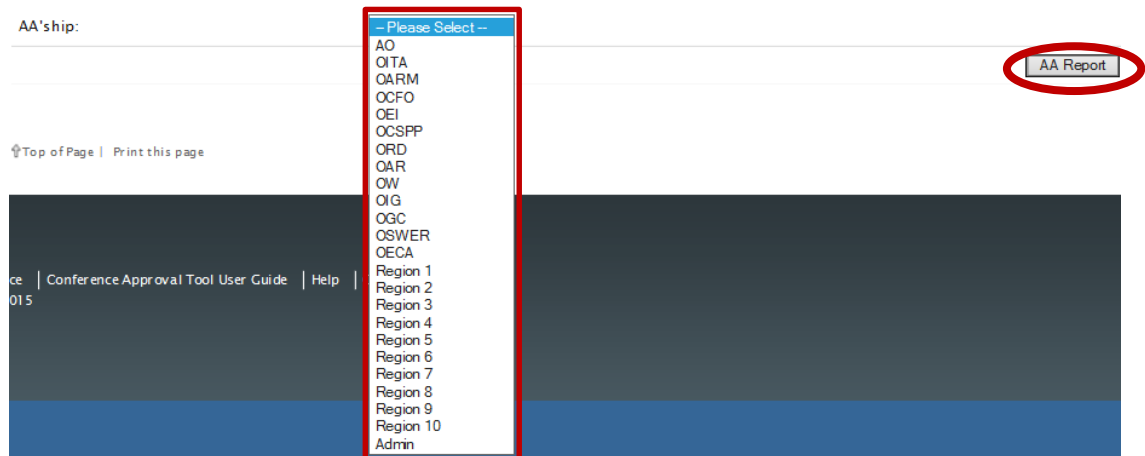
²² Events "attended" by the Agency are exempt from this requirement.

2. You are a staff member of the originating office

- a. Access the **All Requests** report



- b. Select the Originating RPIO and click **AA Report**
All Requests

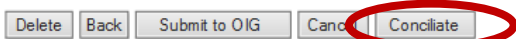


- c. Select the event that you are ready to submit the OIG report to by clicking on the **ID** link.
- d. Follow instructions “b.” through “f.” from option 1 above.

C. How to Reconcile/Complete electronic Form 5170A

The Form 5170 and Form 5170A are the same form within the system. During the Form 5170A portion, you are updating the form to reflect the actual expenses that the Agency incurred for the event and reconciling the actuals against your budget. This part should be completed **AFTER** you have submitted the 15 OIG Report.

1. Under your **My Forms** select the event you submitted/approved by clicking on the **ID** link.
2. Update all applicable fields with the actual data and actual amounts.
3. Upload any documents that may be required per your office's instruction or per OCFO.
 - a. Note: If your actuals exceed the budgeted amount, the Form 5170A will be routed through the approval chain for "acknowledgement" of overages.
 - b. If your actuals exceeded the \$100K threshold you are required to submit a supplemental form justifying the costs and accompany your package with a memorandum to the Deputy Administrator.
 - c. If your event originally was over \$100K your AA will be required to upload a signed memorandum to the Deputy Administrator justifying the cost overages. Please see part V.C.2.c of this guidance for further clarification.
4. Press the **Conciliate** (i.e. reconcile) button to complete the form.



By pressing submit you will be sending a report to the OIG to meet your statutory 15 day reporting requirement. In addition you, the originator, on behalf of your office hereby certify that: "I have submitted the proper report to the OIG pertaining to this respective conference and that I have updated the number of attendees, location, and dates of the conference and what has been submitted is complete and true."

5. If your event is routed through the approval chain because actuals exceeded estimates individuals in the approval chain should follow the same instructions as outlined in "How to Submit and Approve an Event".

Appendix 6: Conference Spending Overview

